

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Ronald D. Coleman (RC 3875)

Rosalie Valentino (RV 1232)

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*Attorneys for Intervenors*

*Sharyl Attkisson, Edwin Black and Steven Emerson*

MARK I. SOKOLOW, *et al.*,

*Plaintiffs,*

*vs.*

THE PALESTINE LIBERATION  
ORGANIZATION, *et al.*,

*Defendants.*

No. 04 Civ. 00397 (GBD) (RLE)

**DECLARATION OF COUNSEL  
IN SUPPORT OF MOTION TO  
INTERVENE AND UNSEAL  
JUDICIAL DOCUMENTS**

RONALD D. COLEMAN, pursuant to 28 U.S.C. § 1746, declares and says as follows:

1. I am a member of the Bar of this Court and a partner at the law firm of Goetz Fitzpatrick LLP, attorneys for the Intervenors herein.

2. I make this declaration in support of the petition filed by Intervenors to intervene for the purpose of unsealing certain judicial documents, as set forth in the accompanying memorandum of law.

3. I have personal knowledge of the facts stated herein and, if called upon to do so, I could and would competently testify to the following.

4. Attached hereto as Exhibit A is a true and correct copy of the first three pages of the professional biography of Intervenor Sharyl Attkisson published on her personal website,

located at <http://sharylattkisson.com/sharyl-attkisson>, and which I personally viewed and printed on this date. I redacted the bottom of the third page and the subsequent pages because that material consisted of third party comments, not biographical information.

5. Attached hereto as Exhibit B is a true and correct copy of the professional biography of Intervenor Edwin Black published on his personal website, located at <http://edwinblack.com>, and which I personally viewed and printed on this date.

6. Attached hereto as Exhibit C is a true and correct copy of the professional biography of Intervenor Steven Emerson published on his personal website, located at <http://www.steveemerson.com/about>, and which I personally viewed and printed on this date.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



---

Ronald D. Coleman

Dated: New York, New York  
October 27, 2014

**EXHIBIT A**

# Sharyl Attkisson

## Untouchable Subjects. Fearless Reporting.

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### Bio

Attkisson is an Emmy award winning investigative journalist and author.

She became a Washington-based correspondent for CBS News in January 1995. Prior to that, she co-anchored CBS News "Up to the Minute."

Before joining CBS, Attkisson was an anchor and correspondent for CNN (1990-1993). From 1996-2001, in addition to her CBS News duties, Attkisson hosted a half-hour weekly medical news magazine on PBS entitled "HealthWeek."

Prior to working on the national news, Attkisson was a reporter, anchor and/or producer at WTVT Tampa (1986-1990), WBNS Columbus, Ohio (1985-1986) and WTVX Ft. Pierce (1982-1985).

Attkisson was one of the first journalists to fly on a military combat mission: a B-52 sortie in

Kosovo. She also flew on an F-15 fighter jet Combat Air Patrol (CAP) flight.

Attkisson attended the University of Florida College of Journalism and Communications where she worked as a reporter at WUFT-TV and WRUF radio. Attkisson served on the University's Journalism College Advisory Council (1993-1997) and was chairman in 1996. In 1997, she received the University of Florida's Alumnae of Outstanding Achievement Award. She co-authored the college textbook: "Writing Right for Broadcast and Internet News" (Allyn & Bacon 2003).

## Awards

2013

Investigative Emmy Award for "Investigating Congress." Investigative Emmy nomination for "Benghazi: Dying for Security."

Emmy Award nomination for "Green Energy Going Red."

Daytime Emmy Award as part of CBS Sunday Morning team entry for Outstanding Morning Program for "Washington Lobbying: K-Street Behind Closed Doors"

Finalist in Gerald Loeb Business Awards for "The Business of Congress"

2012

Emmy Award for Outstanding Investigative Journalism for "Gunwalker: Fast and Furious."

RTNDA Edward R. Murrow Award for Excellence in Investigative Reporting for "Gunwalker: Fast and Furious."

2011

Emmy Award Nomination for Investigations of Congress: "Follow the Money."

Emmy Award Nomination for Investigating Aid to Haiti earthquake victims.

2010

Emmy Award for Outstanding Investigative Reporting of a Business News Story for series on the Bush Administration's Bait-and-Switch on TARP and the Bank Bailout.

Investigative Reporter and Editors Finalist Award for "Investigating TARP."

Loeb finalist for Television Breaking News for "Follow the Money: Bailout Investigation."

2009

Emmy Award Nomination for "Follow the Money."

2008

RTNDA-Edward R. Murrow Award for Overall Excellence (CBS team award)

2005

RTNDA-Edward R. Murrow Award for Overall Excellence (CBS team award)

2003

Emmy Award Nomination for Investigating Dangers of certain prescription drugs and vaccines; and conflicts of interest in medical industry.

2002

Emmy Award for Outstanding Investigative Journalism for series on mismanagement at the Red Cross: "Red Cross Under Fire."

2001

Emmy Award Nomination for "Firestone Tire Fiasco."

Civil Justice Foundation Special Commendation for Firestone Tire coverage.

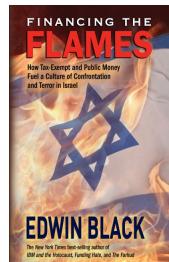
2000

Investigative Reporter and Editors Finalist Award for series on the dangers of certain prescription drugs and vaccines.

Attkisson received several other awards for her reporting and producing, including a New York Black Journalists Association public service award, a Mature Media National Award, a Florida Emmy Award, a Sigma Delta Chi Award and a Florida Communicator's Award.

## 22 Responses to "Bio"



**Best Selling Books****Award-Winning Articles****Cutting Edge News****Television****Film****Videos****Awards and Nominations****Events 1999-2009****Events 2014-2015****Human Rights****Researchers Needed****Travel****Biography****Contact****Edwin Alerts****Retractions****Social Networking****Order Books****EBooks****Trailers****Book TV****Support****Newest Book:****Also Released:**

**Edwin Black** is the award-winning, New York Times bestselling international investigative author of 120 award-winning editions in 14 languages in 65 countries, as well as scores of newspaper and magazine articles in the leading publications of the United States, Europe and Israel. With more than a million books in print, his work focuses on human rights, genocide and hate, corporate criminality and corruption, governmental misconduct, academic fraud, philanthropic abuse, oil addiction, alternative energy and historical investigation. Editors have submitted Black's work ten times for Pulitzer Prize nomination, and, in recent years, he has been the recipient of a series of top editorial awards. He has also contributed to a number of anthologies worldwide. Black has been interviewed on hundreds of network broadcasts from Oprah, the Today Show, CNN Wolf Blitzer Reports and NBC Dateline in the US, as well as the leading networks of Europe and Latin America. His works have been the subject of numerous documentaries, here and abroad. Many of his books have been optioned by Hollywood for film, with two in active production. Black's speaking tours include hundreds of events in dozens of cities each year, appearing at prestigious venues from the Library of Congress in Washington, D.C. to the Simon Wiesenthal Institute in Los Angeles, also in Europe from London's British War Museum and Amsterdam's Institute for War Documentation to Munich's Carl Orff Hall. In recent times he has appeared to speak, lecture or testify in three legislatures on social justice issues: U.S. House of Representatives, North Carolina General Assembly, and the European Parliament. Black is a leading contributor to *The Cutting Edge News*, which receives more than 1.5 million visits monthly, as well as *the Huffington Post*, *the Times of Israel*, and numerous other on-line publications. In February and early March 2014, Black appeared before four parliaments in four weeks: The British House of Commons in London, the European Parliament in Brussels, the Israeli Knesset in Jerusalem, and finally the U.S. House of Representative Foreign Affairs Committee in Washington, D.C. Black is a leading contributor to *The Cutting Edge News*, which receives more than 1.5 million visits monthly, as well as *the Huffington Post*, *the Times of Israel*, and numerous other on-line publications. His weekly human rights and social justice TV show, The Edwin Black Show, broadcasts on IBC-TV. His weekly human rights and social justice TV show, The Edwin Black Show, broadcasts on IBC-TV.

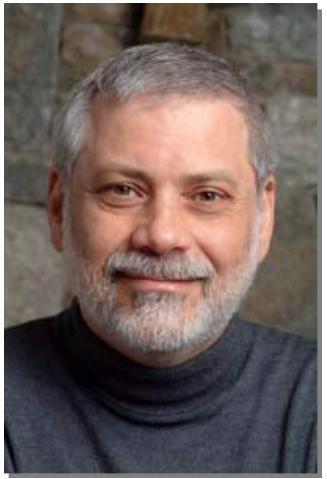
Black's eleven award-winning bestselling books are **IBM and the Holocaust** (2001 and 2012), **Financing the Flames** (2013), **British Petroleum and the Redline Agreement** (2011), **The Farhud** (2010), **Nazi Nexus** (2009), **The Plan** (2008), **Internal Combustion** (2006), **Banking on Baghdad** (2004), **War Against the Weak** (2003 and 2012), **The Transfer Agreement** (1984 and 2009), and a 1999 novel, **Format C**: His enterprise and investigative writings have appeared in scores of newspapers from the *Washington Post*, *Los Angeles Times* and *Chicago Tribune* to the *Sunday Times of London*, *Frankfurter Zeitung* and the *Jerusalem Post*, as well as scores of magazines as diverse as *Playboy*, *Sports Illustrated*, *Reform Judaism*, *Der Spiegel*, *L'Express*, *BusinessWeek* and *American Bar Association Journal*. Black's articles are syndicated worldwide by Feature Group News Service.

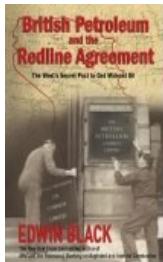
In 2012, Black was featured at scores of speaking events in the United States and overseas, highlighting all his published works. His tour appearances included one before the European Parliament in Brussels about **IBM and the Holocaust** and modern-day privacy concerns.

In 2011, Black was featured at scores of speaking events in the United States and overseas, highlighting all his published works. His travels included a four-week scholar-in-residence in Australia, sponsored by the Shalom Institute focusing on his work in petropolitics and Holocaust history. He was also asked to deliver a week-long 5-campus scholar-in-residence in North Carolina sponsored by a coalition of that state's universities, legislators, civic institutions, and other leadership groups, exploring the dark side of eugenics, this arising from his bestseller **War Against the Weak**, now a feature-length documentary of the same name. The North Carolina tour was marked by several standing-room only appearances.

During 2011 and 2010, Black received three service awards: from Moriah College in Sydney for his work in **Nazi Nexus**, the Jewish War Veterans for his work in the book **The Transfer Agreement**, and from Hadassah Ahavat Yisrael for his work in the book **The Farhud**. In 2010, the American Association of People with Disabilities (AAPD), in a Capitol Hill ceremony, bestowed its coveted "Justice for All" on Black for his work on eugenics and his book **War Against the Weak**.

In 2008, the American Jewish Press Association gave Black its Rockower Award for best





investigative article of the year, arising from the series "Hitler's Carmaker," syndicated internationally by the JTA.

In 2006-2007, Black's book **Internal Combustion** was honored with four major editorial awards: Best Book of the Year from American Society of Journalists and Authors, a Rockower Award for Best Investigation of the Year from the American Jewish Press Association, a Green Globe, and the Thomas Edison Award.

In 2005, Black won the World Affairs Council's award for the Best World Affairs Book for **Banking on Baghdad**, and the Doña Gracia Medal for Best Book of The Year. In 2004, he won the coveted Rockower First Prize Award for Investigative Journalism from the American Jewish Press Association for *Funding Hate*, his acclaimed, syndicated investigation of the Ford Foundation's systematic funding of hate groups.

In 2003, he received the top two editorial awards from the American Society of Journalists and Authors: Best Book of the Year for **IBM and the Holocaust** and Best Article of the Year for "IBM in Auschwitz" in the *Village Voice*. Also in 2003, Black received the International Human Rights Award from the World Affairs Council for **War Against the Weak**.

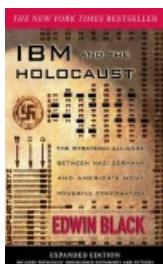
Editors have submitted Black's work for Pulitzer Prize nomination nine times, most recently for **Internal Combustion**, and three times for the National Book Award. In addition, Black received the Carl Sandburg Award for **The Transfer Agreement** as well as two Folio Awards and a Computer Press Association Award for excellence in magazine publishing.

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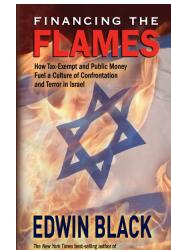
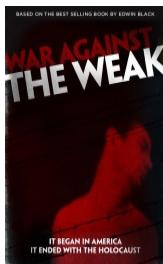
Latest Edition:



Recent Edition:



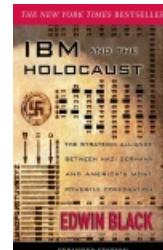
Latest Film:



Released 2013



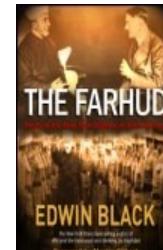
Expanded Edition 2012



Expanded Edition 2012



Released 2011



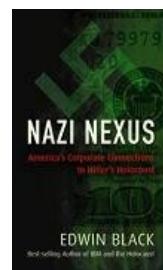
Released 2010

## Books

120 bestselling editions in 14 languages in 65 countries



25th Anniversary  
2009



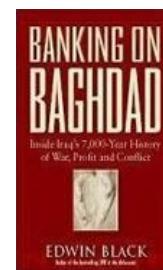
Released 2009



Released 2008



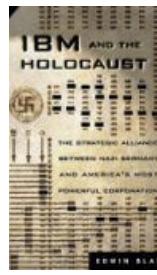
Released 2006



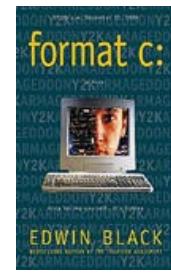
Released 2004



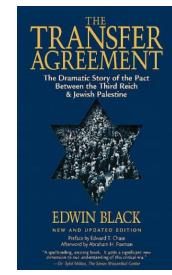
Released 2003



Released 2001

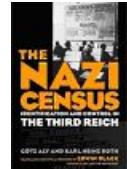


Released 1999

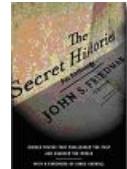


Released 1984

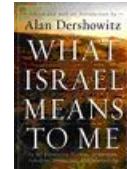
Contributor and editor for various anthologies and related works.



2004



2005



2006



2007



2013

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## Articles

Edwin Black's enterprise and investigative journalism, as well as perspectives and book excerpts, are syndicated to more than 100 leading newspapers and magazines throughout the world. In the United States, outlets as diverse as the *Washington Post*, the *Chicago Tribune*, *Newsday*, the *Los Angeles Times*, the *Village Voice*, *Playboy*, *Reform Judaism*, the *American Lawyer*, and *Journal of the American Bar Association*. Overseas in such outlets as the *Sunday Times*, the *Guardian*, *Der Spiegel*, *L'Express* and the *Jerusalem Post*.



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# Biography

## EXHIBIT C

Steven Emerson is considered one of the leading authorities on Islamic extremist networks, financing and operations. He serves as the Executive Director of The Investigative Project on Terrorism, one of the world's largest storehouses of archival data and intelligence on Islamic and Middle Eastern terrorist groups. Emerson and his staff frequently provide briefings to U.S. government and law enforcement agencies, members of Congress and congressional committees, and print and electronic media, both national and international. Since 9-11, Emerson has testified before and briefed Congress dozens of times on terrorist financing and operational networks of Al Qaeda, Hamas, Hezbollah, Islamic Jihad, and the rest of the worldwide Islamic militant spectrum.

Emerson is the author or co-author of six books on terrorism and national security, including:

- *Jihad Incorporated: A Guide to Militant Islam in the U.S.* (Prometheus, 2006)
- *American Jihad: The Terrorists Living Among Us* (The Free Press, 2002)
- *Terrorist: The Inside Story of the Highest-Ranking Iraqi Terrorist Ever to Defect to the West* (Villard Books /Random House, 1991)
- *The Fall of Pan Am 103: Inside the Lockerbie Investigation* (Putnam's Sons, 1990)
- *Secret Warriors: Inside the Covert Military Operations of the Reagan Era* (Putnam's Sons, 1988)
- *The American House of Saud: The Secret Petrodollar Connection* (Franklin Watts, 1985)



He and his organization have been quoted or profiled in hundreds of newspaper and television stories since 9-11.

Emerson launched The Investigative Project on Terrorism in late 1995, following the broadcast of his documentary film, "Jihad in America," on public television. The film exposed clandestine operations of militant Islamic terrorist groups on American soil. For the film, Emerson received numerous awards including the George Polk Award for best television documentary, one of the most prestigious awards in journalism. He also received the top prize from the Investigative Reporters and Editors Organization (IRE) for best investigative report in both print and television for the documentary. The award from IRE was the fourth he had received from that group. The documentary, which was featured on *60 Minutes*, has become standard viewing for federal law enforcement and intelligence organizations.

Emerson is recognized as one of the first terrorism experts to have testified and warned about the threat of Islamic militant networks operating in the United States and their connections worldwide. In a pioneering congressional testimony delivered in 1998, he specifically warned about the threat of Osama Bin Laden's network. Nearly every one of the terrorist suspects and groups first identified in his 1994 film have been indicted, convicted, or deported since 9-11.

## Contact Information

Steven Emerson  
5614 Connecticut Ave NW No.341  
Washington, DC 20015

Email: [stopterror@aol.com](mailto:stopterror@aol.com)  
 Fax: 202-966-5191

## What they're saying about Steven Emerson

"Steve has been on the cutting edge of [investigating terrorism] for many, many years... he has provided an extremely valuable service."

**- Robert Blitzer, Former Counterterrorism Chief at the FBI**

"[Steve] has been doing this a very long time, he is very professional, he is very thorough... Steve produces very unique, very significant information."

**- Steven Pomerantz, former Assistant Director of the FBI, former Chief of Counterterrorism of the FBI**

"When we would ask FBI if there were criminal violations of support to terrorism such as establishing Web sites soliciting funds or other means of terrorist financing, we would get blank stares. Rick Newcomb's office at Treasury was trying to give the FBI some guidance on where to look for terrorist money, but to little avail. When FBI said there were no Web site in the U.S. that were recruiting jihadists for training in Afghanistan or soliciting money for terrorist front groups, I asked Steve Emerson to check. Emerson had written the book *American Jihad*, which had told me more than the FBI ever had about radical Islamic groups in the U.S. Within days, Emerson had a long list of Web sites sitting on servers in the United States. I passed the list to Justice and the FBI..."

**- Richard A. Clarke, former chief of counter-terrorism for National Security Council, Against All Enemies: Inside America's War on Terror, pp217.**

"I think of Steve as the Paul Revere of terrorism'... [Clarke] credits Emerson with repeatedly warning of Al Qaeda sleeper cells in the United States. He adds that he would attend Emerson's speeches whenever possible because 'we'd always learn things we weren't hearing from the FBI or CIA, things which almost always proved to be true.'"

**- Richard Clarke, former head of NSC Counterterrorism, in a feature article on Emerson in Brown Alumni Magazine**

"...Emerson was helpful in preparing to cross-examine defense witnesses in the [1993 World Trade Center bombings] case....He's a valuable source of information and knowledge. And in terms of trying to find places to look for evidence, he's a very good person to talk to. He's got a lot of insight."

**- Andrew McCarthy, Assistant U.S. Attorney who prosecuted the 1993 World Trade Center bombings**

"[Emerson is] the most authoritative expert on Middle Eastern terrorism in the United States today and whose investigations have uncovered the existence of terrorist groups operating in the United States today... This country owes a great deal of gratitude to him."

**- Senator John Kyl R-AZ**

"Mr. Emerson has for so long been right on [his] predictions about our long fight against terrorism... Mr. Emerson has shared his very important insights with this subcommittee on a number of occasions in recent years. His expertise is based on daily contact with sources in government and key financial institutions as well as his participation in major terrorist financing cases."

**- U.S. Representative Ed Royce R-CA**

"[The Investigative Project] was a decade ahead of its time in focusing on the terrorist threat to the United States and to our homeland from Islamic extremist..."

**- U.S. Representative Brad Sherman D-CA**

"Steve was also the one who before 9/11 was saying, 'it's coming, it's coming, it's coming', and Islamic terrorists are going to hit us, and 9/11 came, and he was one of the only ones screaming about it at the time."

**- Dan Abrams, The Abrams Report**

"Steve Emerson, you have been a fighter, a hero in the battle against terrorism in this country."

**- John Kasich, Heartland with John Kasich**

"Steve Emerson is one of the nation's best national security correspondents. His investigative work on radical Islamic fundamentalism is absolutely critical to this nation's national security. There is no one else who has exhibited the same expertise, courage and determination to tackle this vital issue."

**- A.M. Rosenthal, former managing editor of NY Times.**